

Terri H. Didion, Assistant United States Trustee
 State Bar No. CA 133491
 Justin C. Valencia, Trial Attorney
 State Bar No. NE 25375 | State Bar No. IA AT0012006
 United States Department of Justice
 Office of the U.S. Trustee
 300 Las Vegas Boulevard So., Suite 4300
 Las Vegas, Nevada 89101
 Telephone: (702) 388-6600
 Facsimile: (702) 388-6658
 Email: justin.c.valencia@usdoj.gov

Attorney for TRACY HOPE DAVIS
 United States Trustee for Region 17

**UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA**

In re:

SILVER STATE BROADCASTING, LLC,

AFFECTS THIS DEBTOR ☐

AFFECTS GOLDEN STATE
 BROADCASTING, LLC ☐

AFFECTS MAJOR MARKET
 RADIO, LLC ☐

AFFECTS ALL DEBTORS ☒

Debtor(s).

Case No. BK-21-14978-ABL

Chapter 11

Jointly administered with:

Golden State Broadcasting, LLC,
 Case No. 21-14979-ABL

Major Market Radio, LLC,
 Case No. 21-14980-ABL

Hearing Date: *OST Requested*

Hearing Time: *OST Requested*

Location: *OST Requested*

**DECLARATION OF JUSTIN C. VALENCIA IN SUPPORT OF THE
 UNITED STATES TRUSTEE'S MOTION FOR ORDER SHORTENING TIME
 ON THE UNITED STATES TRUSTEE'S MOTION TO APPOINT
 CHAPTER 11 TRUSTEE UNDER 11 U.S.C. § 1104(a), OR, IN THE
 ALTERNATIVE, TO CONVERT CASE TO CHAPTER 7 PURSUANT
 TO 11 U.S.C. § 1112(b); AND MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT AND RESERVATION OF RIGHTS**

///

1 I, Justin C. Valencia, declare as follows:

2 1. I am a Trial Attorney for the United States Department of Justice, Las Vegas,
3 Nevada Office of the United States Trustee, Region 17 (“UST”).

4 2. I make this Declaration in support of the *United States Trustee’s Motion to*
5 *Appoint Chapter 11 Trustee Under 11 U.S.C. § 1104(a), or, in the Alternative, to Convert Case*
6 *to Chapter 7 Pursuant to 11 U.S.C. § 1112(b); and Memorandum of Points and Authorities in*
7 *Support and Reservation of Right* (“Motion”) filed in the above-captioned jointly administered
8 chapter 11 cases.

9 3. There are compelling reasons for scheduling an expedited hearing on the Motion.
10 The above-named jointly administered Debtors have failed to comply with their fiduciary duties
11 including the filing or the timely filing of MORs; the payment of UST fees; confirm a plan of
12 reorganization within a reasonable amount of time and otherwise failing to prosecute these cases
13 timely; have net operating losses; have failed to provide proof of insurance; and, are corporate
14 debtors and do not currently have counsel of record.

15 4. Attached as Exhibits “1” and “2” hereto are true and correct copies of the Motion
16 and supporting Declaration as required by Local Bankruptcy Rule 9006(a).

17 I declare under penalty of perjury that the foregoing statements are true and correct.

18 Executed in Las Vegas, Nevada on February 17, 2023.

19 /s/ Justin C. Valencia

20 Justin C. Valencia
21 Trial Attorney
22 for the United States Trustee